



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

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Order Instituting Rulemaking to Promote Policy)	
and Program Coordination and Integration in)	
Electric Utility Resource Planning.)	Rulemaking 04-04-003
)	(Filed April 1, 2004)
Order Instituting Rulemaking to Promote)	
Consistency in Methodology and Input)	
Assumptions in Commission Applications of)	Rulemaking 04-04-025
Short-run and Long-run Avoided Costs, Including)	(Filed April 22, 2004)
Pricing for Qualifying Facilities.)	

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
NOTICE OF EX PARTE COMMUNICATION

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Dated: **August 14, 2007**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
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SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
NOTICE OF EX PARTE COMMUNICATION

Pursuant to Rule 8.3 of the Commission's Rules of Practice and Procedure, Southern California Edison Company (SCE) hereby gives notice of the following *ex parte* communication in the above-referenced proceedings.

On Thursday, August 9, 2007, Michael Hoover, Director of Regulatory Affairs of SCE sent the attached email to Nancy Ryan and Andrew Schwartz, Advisors to Commission President Peevey. A copy of the email was served on all parties to R.04-04-003 (QF Issues) and R.04-04-025 (QF Issues) on the same day.

To receive a copy of this *ex parte* notice, please contact Henry Romero at (626) 302-4124
[e-mail address: Henry.Romero@sce.com]

Respectfully submitted,

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/s/ Berj K. Parseghian

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August 14, 2007



Michael Hoover/SCE/EIX

08/09/2007 11:45 AM

To ner@cpuc.ca.gov, AS2@cpuc.ca.gov

cc

Subject Avoided Cost Proceeding



FOR INTERNAL USE ONLY

Hi Nancy and Andy,

Bruce requested that I send you copies of the SCE's Comments on the original PD on Avoided cost. Attached are our Comments and Reply Comments.

I want to emphasize a few points regarding the PD:

1. The methodology that is contained in the revised PD may not be able to be implemented. The reason is that the method relies on using estimates from two year forward transactions for power and gas to calculate a heat rate. These data may not exist and if they do, they are likely confidential and we have concerns that the forward market for electricity is sufficiently liquid or transparent and may be subject to manipulation. SCE's method of using 12 month historical data on day ahead SP-15 prices relies on transparent, market based data. In fact the day ahead SP-15 price is what SCE uses to dispatch resources and represents our true short run avoided cost. Nevertheless, SCE is open to discussing other approaches..
2. MRTU is scheduled to be completed next year and, at that time, SCE will petition the FERC to be relieved of the must take provisions of PURPA. Thus, there is no need to require Standard Offer contracts for expiring or new resources. This is especially true since the requirement would only apply to IOUs and not to other LSEs.

Please call me if you want to discuss further.



SCE Comments on Avoided Cost PD.pdf



SCE Reply Comments on Avoided Cost PD.pdf

Michael R. Hoover
Director, Regulatory Affairs
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San Francisco Office

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SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E)
COMMENTS ON PROPOSED DECISION OF ALJ HALLIGAN

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Dated: **May 25, 2007**

**Southern California Edison Company's (U 338-E)
Comments on Proposed Decision of ALJ Halligan**

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Comments on Proposed Decision of ALJ Halligan**

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SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E)
COMMENTS ON PROPOSED DECISION OF ALJ HALLIGAN

Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully submits these comments on the Proposed Decision of Administrative Law Judge Halligan on Future Policy and Pricing for Qualifying Facilities (QFs), issued on April 24, 2007 (Proposed Decision).

Overall, the Proposed Decision provides a thoughtful and well-reasoned approach to the many issues raised in this proceeding. In particular, the Proposed Decision recognizes the substantial merit in relying on markets to establish avoided cost pricing, as evidenced most clearly by the Proposed Decision’s determination to adopt a market-based methodology for determining the short-run avoided cost (SRAC) of energy. The Proposed Decision, however, has several significant flaws which, if left uncorrected, will produce above-market payments in excess of avoided cost and impose additional – and unnecessary – long-term contracting burdens on investor owned utility (IOU) bundled service customers that will not be shared by customers of other retail providers. The resulting inequity would be further exacerbated should the Commission pursue a future policy of expanded competitive retail choice.

As discussed below, mandatory long-term standard offer contracts are not required by the Public Utility Regulatory Policies Act of 1978¹ (PURPA). The imposition of mandatory long-term standard offer contracts will skew the existing retail market, will burden utility customers with a disproportionate share of costs, and may produce stranded costs. If the Commission sees broader societal benefits in these contracts, it should require that the costs be borne by *all* customers – not by just IOU bundled service customers.

Second, the Proposed Decision proposes to adopt methodologies and values that will produce energy and capacity prices in excess of avoided cost. With respect to energy, the Proposed Decision inappropriately double-counts the cost associated with variable operations and maintenance (O&M). The Proposed Decision also adopts excessive values, not supported by the record, for both “as-available” capacity and firm capacity. In the event that the Commission chooses to adopt long-term contracting obligations notwithstanding the fundamental policy conflict inherent in such a choice, it is essential that the Commission correct the errors in avoided cost pricing in order to avoid stranded costs.

Third, it is critical that the Commission adopt the modifications to the SRAC energy pricing mechanism in the Proposed Decision retroactively. The same record that demonstrates the need to make prospective changes in the SRAC energy pricing methodology amply demonstrates that energy payments to QFs have exceeded avoided cost for many years. Therefore, SCE respectfully requests that the Commission adopt the Proposed Decision with the modifications described herein.

I.

NEW STANDARD OFFER CONTRACTS ARE INCONSISTENT WITH STATE AND FEDERAL POLICY AND SHOULD BE REJECTED

As the Proposed Decision itself recognizes, standard offer contracts are *not* required by PURPA, nor are must-take obligations of any particular duration. Mandating new long-term standard offer contracts for new and existing QFs will cause IOU bundled service customers to bear additional costs, such as debt equivalence, without imposing such an obligation on customers of other retail providers. There is no reason why IOU bundled service customers

¹ Pub.L. No. 95-617 (Nov. 9, 1978), *codified in part at* 16 U.S.C. § 824a-3 *et seq.*

should bear long-term contract costs for existing QF projects, which have already benefited from high payment streams over many years. To the extent the Commission is attempting to encourage the development of new QF generation resources through long-term contracts in order to enhance system-wide reliability, all customers, not just IOU bundled service customers, should bear such costs.

Moreover, imposing long-term contracting requirements on some but not all customers is fundamentally at odds with the potential reinstatement of “direct access” competitive retail choice being considered by the Commission and scheduled to resume once the current suspension of customer choice ends. Nevertheless, the Proposed Decision would impose long-term contracting obligations solely on utilities at a time when the Commission is considering having the utilities compete with other load serving entities who are not similarly burdened. The Commission has the discretion to avoid implementing PURPA in a manner that undermines fair cost obligations for all customers and potential changes to California’s retail energy market. As history has proven, failing to confront this issue head-on now may prove disastrous.

Prior to discussing the dramatic failure of the standard offer program of the 1980s and suspending the availability of the last remaining standard offer contract prior to deregulation, Decision (D.)96-10-036 begins by explaining:

The utilities assert a need to restructure their long-term power purchase obligations for a more competitive marketplace, one brought about by Rulemaking 94-04-031/Investigation (I.) 94-04-032 (the electric industry restructuring proceeding), the Energy Policy Act of 1992 (EPAct), and the possible repeal of the Public Utility Regulatory Policies Act of 1978 (PURPA).²

The utilities find themselves in a similar position today. The Commission is presently considering instituting a rulemaking “as to whether, when, or how direct access should be restored.”³ In addition, the Energy Policy Act of 2005 added Section 210(m) to PURPA, which “provides for termination of an electric utility’s obligation to purchase energy and capacity from [QFs], if FERC finds that certain market conditions are met.”⁴ The California Independent System Operator’s (CAISO) Market Redesign and Technology Upgrade (MRTU), which is scheduled for implementation in early 2008, is expected to satisfy those market conditions, and

² D.96-10-036, 68 Cal. P.U.C. 2d 434, 439 (1996).

³ See Petition No. 06-12-002.

SCE intends to file a petition seeking relief from the PURPA mandatory purchase obligation upon implementation of MRTU.

The Proposed Decision's adoption of five- and ten-year standard offer contracts is inconsistent with these policies and threatens to repeat mistakes of the past. D.96-10-036 explains how the standard offer program resulted in substantial and continuing overpayments for QF capacity, created an enormous burden on ratepayers, and impeded the development of competitive markets:

[I]n our early efforts to promote QF development, we made available standard offers that were not contingent upon the utility's voluntary offer: standard offers were effectuated through regulatory order of their availability, and the voluntary acceptance of that offer by a QF formed the agreement. This approach failed dramatically and we suspended, without hearings, standard offer 2 and interim standard offer 4 for that reason. The combination of standard offer prices and their ready availability led to more dramatic subscription than the Commission anticipated. Because a basic tenant of PURPA is the indifference of ratepayers of the purchase price, relative to utility self-generation or other purchases (18 Code of Federal Regulations (CFR) Section 292.101(b) (6)), the Commission has previously suspended the availability of standard offers. *Unfortunately, by the time the Commission acted to suspend standard offer 2 and interim standard offer 4, many agreements the Commission chose to honor had been signed by QF developers, and those agreements are now a significant (but not the only) contributor to California's high rate problem and corresponding regional competitive disadvantage to California business. Existing QF agreements are expected to contribute billions of dollars to the competitive transition charge (CTC) that must be paid by ratepayers in order to move to a more competitive generation market.*⁵

The Commission should heed this warning and decline to adopt new standard offer contracts at this time. Specific modifications to the Proposed Decision that decline to adopt new standard offer contracts are set forth in **Attachment A** hereto.

To the extent the Commission persists in adopting standard offer contracts, the Commission should make the modifications discussed below and set forth in **Attachment B** hereto. Specifically, the benefits and costs of new QF obligations should be allocated to all customers to avoid imposing potential stranded costs solely on utility bundled service customers.

Continued from the previous page

⁴ Notice of Proposed Rulemaking, 71 Fed. Reg. 4532 (Jan. 27, 2006); see 16 U.S.C. § 824a-3(m).

⁵ D.96-10-036, 68 Cal. P.U.C. 2d at 442-43 (*emphasis added*).

To the extent the Commission is ordering these new QF contract obligations for system reliability reasons, Public Utilities Code section 380(g) authorizes the Commission to allocate the costs to all customers.⁶ In addition, section 380(b) expressly authorizes the Commission to “[e]quitably allocate the cost of generating capacity and prevent shifting of costs between customer classes.”⁷

The Proposed Decision should also be modified to establish an eligibility window that will limit the potential for another QF “gold rush.” Because the availability of the standard offer contracts described in the Proposed Decision is likely to be limited as a result of the anticipated suspension of SCE’s PURPA purchase obligation, there is a significant risk that existing and new QFs will seek to “grandfather” their opportunity for long-term contracts immediately. Therefore, any new contracts should only be available to existing QFs with contracts that expire in a rolling 24-month window and to new QFs that will come online within a rolling 36-month window. In addition, these contracts should cease to be available as of the effective date of a FERC order terminating SCE’s PURPA purchase obligation. Finally, the Proposed Decision should be modified to expressly state that all new or renewed QF contracts must comply with the greenhouse gas emissions performance standard (“EPS”) to the extent required by Senate Bill 1368 and D.07-01-039.

II.

THE QF ENERGY AND CAPACITY PRICES ADOPTED IN THE PROPOSED DECISION EXCEED SCE’S AVOIDED COST

The Proposed Decision adopts a Market Index Formula (MIF) for SRAC energy based on a methodology proposed by SCE,⁸ an “as-available” capacity price of \$60.84/kW-yr for 2007 based on the fixed charge associated with a combustion turbine less ancillary services value,⁹ and a firm capacity price of \$104/kW-yr “based on the market price referent (MPR) capacity cost

⁶ See Cal. Pub. Util. Code § 380(g).

⁷ Cal. Pub. Util. Code § 380(b)(2); see also Cal. Pub. Util. Code § 380(h)(4).

⁸ See Proposed Decision at 61-62, Finding of Fact No. 17.

⁹ See *id.* at 85, 90.

adopted in Resolution E-4049”¹⁰ Each of these payment methodologies contains flaws which result in payments that exceed SCE’s avoided cost. Failure to deduct variable O&M from the power price in the MIF results in a double-payment for variable O&M. The as-available capacity price exceeds SCE’s avoided cost because “as-available” capacity value is already included in the SRAC energy price and the Proposed Decision fails to properly deduct ancillary services value. Finally, the firm capacity price exceeds SCE’s avoided cost because it fails to deduct energy-related capital costs and residual value. As discussed more fully below, the Proposed Decision should be modified to correct each of these flaws and to yield QF energy and capacity payments that are consistent with SCE’s avoided cost.

A. THE SRAC ENERGY FORMULA ADOPTED IN THE PROPOSED DECISION YIELDS PAYMENTS THAT EXCEED SCE’S AVOIDED COST

1. The SRAC Energy Formula Adopted In The Proposed Decision Yields Payments That Exceed SCE’s Avoided Cost Because It Double-Pays For Variable O&M

The Proposed Decision adopts a MIF for SRAC that is based on a methodology proposed by SCE.¹¹ The MIF uses a twelve-month rolling average of historical day-ahead market prices to calculate a market heat rate, which is multiplied by a burnertip gas price to yield SRAC.¹² The MIF is calculated as proposed by SCE, “with the exception that the MIF does not deduct an O&M value from the power price in the heat rate calculation.”¹³ However, the Proposed Decision’s failure to deduct an O&M value results in an SRAC price that exceeds avoided cost.

The day-ahead market prices that are used to calculate the market heat rate already include variable O&M.¹⁴ However, the MIF pays for variable O&M through a separate O&M

¹⁰ *Id.* at 85-86.

¹¹ *See id.* at 61-62, Finding of Fact No. 17.

¹² *See id.*

¹³ *See id.* at Table 4.

¹⁴ *See* TURN Rebuttal Testimony, Ex. 150 at 4.

adder.¹⁵ Therefore, O&M must be subtracted from the power price prior to calculating the market heat rate in order to provide a heat rate that does not include variable O&M. This is why the methodology proposed by SCE subtracts variable O&M to calculate an implicit market heat rate net of variable O&M.¹⁶ CCC witness Beach employed a similar methodology in his heat rate calculation based on forward prices.¹⁷

The Proposed Decision's failure to "deduct an O&M value from the power price in the heat rate calculation"¹⁸ results in a double-payment for variable O&M.¹⁹ A payment for variable O&M is included in the market heat rate, and a separate payment for variable O&M is included in the O&M adder.²⁰ Consequently, the MIF yields energy payments that exceed SCE's avoided cost. In order to remedy this double-payment, the Proposed Decision should be modified to deduct variable O&M from the power price in the market heat rate calculation, as proposed by SCE.

2. The Proposed Decision Should Not Change SCE's TOU Factors

The Proposed Decision modifies the time-of-use periods and factors that are used to convert annual or seasonal prices into time-period specific prices. Specifically, the Proposed Decision "require[s] the IOUs to include the TOU/TOD factors and periods utilized as part of their most recent RFOs."²¹ No party requested a change to SCE's TOU factors,²² and the TOU factors used in SCE's RFOs are not appropriate for time-differentiating QF payments.

SCE's QF payments are currently time-differentiated using separate factors for energy payments and capacity payments. The TOU factors used in SCE's RFOs are not appropriate for

¹⁵ See Proposed Decision at Table 4.

¹⁶ See SCE Opening Testimony, Ex. 1 at 62-64.

¹⁷ See CCC/Beach, Tr. Vol. 28 at 3906:2-6, 3914:18-21; CCC Opening Testimony, Ex. 102 at Table 7.

¹⁸ See *id.* at Table 4.

¹⁹ See TURN Rebuttal Testimony, Ex. 150 at 4 ("Avoided O&M costs are already part of the market prices which are analyzed by IEP witness Monsen, and are therefore double-counted in his proposal.").

²⁰ See *id.*

²¹ Proposed Decision at 68.

²² See, e.g., CCC Opening Testimony, Ex. 102 at 54:17, 54:24-25 ("Edison's existing TOU factors may not need to be changed. . . . Edison's existing TOU factors already are relatively 'peaky'").

time-differentiating QF payments because they do not have separate factors for energy payments and capacity payments. The TOU factors used in SCE’s renewables solicitations are “all-in” factors that are applied to the combined energy and capacity payments made to renewable resources. They are too peaked to apply to separate energy payments. The price shape factors used in SCE’s all-source RFOs are also not appropriate for time-differentiating QF payments. SCE’s all-source RFOs do not use fixed TOU factors but, instead, use price shapes that vary based on the heat rate of the unit. As a result, they cannot be applied to QF energy and capacity payments.

The TOU factors used in SCE’s RFOs are not appropriate for time-differentiating QF payments, and no party has requested a change to SCE’s TOU factors. Therefore, the Proposed Decision should be modified to direct SCE to continue to use its current TOU factors for time-differentiating QF payments.

3. The Proposed Decision Should Be Modified To Allow Monthly Updates Of Intrastate Transportation Rates For Natural Gas

The Proposed Decision adopts a burnertip gas price for use in calculating SRAC. The Proposed Decision states that it will allow “the [] utilities to *annually* update the intrastate transportation rate to the most recent value in their gas tariffs, as necessary.”²³ However, SoCalGas intrastate transportation rates are currently updated on a *monthly* basis. The Proposed Decision should be modified to allow the utilities to update the intrastate transportation rate on a monthly basis.

²³ Proposed Decision at 66 (*emphasis added*).

B. THE “AS-AVAILABLE” AND FIRM CAPACITY PRICES ADOPTED IN THE PROPOSED DECISION EXCEED SCE’S AVOIDED COST

1. The “As-Available” Capacity Price Adopted in the Proposed Decision Exceeds SCE’s Avoided Cost Because “As-Available” Capacity Value Is Already Included In The SRAC Energy Price And The Proposed Decision Fails to Properly Deduct Ancillary Services Value

The Proposed Decision adopts an “as-available” capacity price of \$60.84/kW-yr for 2007 based on the fixed charge associated with a combustion turbine less ancillary services value.²⁴ As explained in SCE’s opening brief, it is inappropriate to adopt a separate “as-available” capacity value for QFs that do not deliver firm capacity.²⁵ SCE’s testimony in this proceeding establishes that the “all-in” SP-15 day-ahead market prices used in the SRAC methodology adopted by the Proposed Decision already include any value placed by the market on day-ahead firmness.²⁶ Thus, these “all-in” prices include any capacity value attributable to “as-available” deliveries, and the separate “as-available” capacity payment adopted by the Proposed Decision overpays for capacity.²⁷ The Proposed Decision should be modified to eliminate the separate “as-available” capacity payment.

To the extent the Commission retains the separate “as-available” capacity payment, the Proposed Decision’s calculation methodology is flawed and yields payments that exceed SCE’s avoided cost because it fails to properly deduct ancillary services value from the combustion turbine fixed charge. The \$60.84/kW-yr “as-available” capacity price for 2007 adopted by the Proposed Decision is based on the \$65.78/kW-yr real economic carrying charge for a combustion turbine, as proposed by The Utility Reform Network (TURN),²⁸ less \$4.94/kW-yr of “estimated”

²⁴ See *id.* at 85, 90.

²⁵ See SCE Opening Brief at 42-43.

²⁶ SCE Opening Testimony, Ex. 1 at 4:17-18, 91:10-11.

²⁷ See *id.*

²⁸ See Proposed Decision at 85-90, Table 4a; TURN Opening Testimony, Ex. 149 at B-4.

ancillary services that would be provided by a combustion turbine but is not provided by an “as-available” QF.²⁹ The \$4.94/kW-yr deduction for ancillary services is based on \$14.82/kW-yr of combustion turbine ancillary services value calculated by San Diego Gas & Electric Company (SDG&E), reduced by two-thirds “to reflect the fact that SDG&E’s value . . . is more indicative of a peak value.”³⁰ The Proposed Decision’s elimination of nearly \$10/kW-yr of combustion turbine ancillary services value is unfounded, is illogical and has no support in the record.

It is undisputed that there should be a deduction from the combustion turbine fixed charge to account for ancillary services value that is not provided by “as-available” QFs. CCC witness Beach agreed that there should be a deduction from the combustion turbine fixed costs used to establish the “as-available” capacity payment to account for hours in which the proxy combustion turbine would not produce energy but, instead, would sell ancillary services.

Q: Can you accept SDG&E’s position that revenues from sales of ancillary services (A/S) should be netted out from the fixed costs of a [combustion turbine]?

A: Yes, but only if the [combustion turbine] is assumed not to participate in the day-ahead energy market.³¹

“[Y]ou can assume a certain level of, you know, off-peak and mid-peak revenues from selling [] ancillary services, but you can’t – you can’t assume that you’re going to get ancillary service revenues from the unit for every hour of the year.”³² Mr. Beach was concerned that SDG&E “may have used ancillary service prices that include very high ancillary services prices during peak periods . . . because you can’t run your [combustion turbine] and get ancillary services at the same time”³³ However, as discussed below, SDG&E witness Barker’s testimony establishes that Mr. Beach’s concern was unfounded. “If it is producing energy I *didn’t* include it”³⁴

²⁹ See Proposed Decision at 85, 90. It appears that Table 4a of the Proposed Decision failed to deduct the \$4.94/kW-yr of estimated ancillary services value from the \$65.78/kW-yr capacity price shown.

³⁰ *Id.* at 90.

³¹ CCC Rebuttal Testimony, Ex. 103 at 43:19-21; *see also* Proposed Decision at 88.

³² CCC/Beach, Tr. Vol. 28 at 4031:1-5.

³³ *Id.* at 4031:18-23.

³⁴ SDG&E/Barker, Tr. Vol. 25 at 3717:15-16 (*emphasis added*).

In addition, the Federal Energy Regulatory Commission (FERC) recognized that a deduction for ancillary services is appropriate when calculating capacity costs in its order approving the Reliability Pricing Model (RPM) used in the PJM capacity market.³⁵ Under the RPM, the “Cost of New Entry [is] offset by the net energy and ancillary services revenues”³⁶ “[T]he height of the [demand] curve is determined in large part by net Cost of New Entry, which is Cost of New Entry net of the Net Energy and Ancillary Service Revenue offset.”³⁷

The Proposed Decision’s claim that “SDG&E’s value . . . is more indicative of a peak value” is unfounded. Dr. Barker’s testimony during cross-examination demonstrates that SDG&E’s ancillary services value is, in fact, more of an off-peak and mid-peak value, than a peak value. During cross-examination, Dr. Barker explained that his calculation of \$14.82/kW-yr of ancillary services revenues *did not* assume that the combustion turbine would bid into the ancillary services market in all hours.³⁸ The hours in which the combustion turbine is producing energy are relatively high-cost hours,³⁹ and “[i]f it is producing energy I *didn’t* include it, and I also took out some time for maintenance.”⁴⁰ Thus, by eliminating the hours in which the combustion turbine is producing energy from his ancillary service calculation, Dr. Barker eliminated the *highest* cost peak hours. As a result, the \$14.82/kW-yr of ancillary services value calculated by SDG&E is more representative of an off-peak and mid-peak value, than a peak value.

Furthermore, there is additional evidence in the record that demonstrates the reasonableness of the \$14.82/kW-yr of ancillary services value calculated by SDG&E. The CAISO Department of Market Analysis (DMA) calculated that a new combustion turbine would

³⁵ See *PJM Interconnection, LLC, Order Denying Rehearing and Approving Settlement Subject to Conditions*, 117 FERC ¶ 61,331, 62,657 (Dec. 22, 2006).

³⁶ *Id.*

³⁷ *Id.*

³⁸ See SDG&E/Barker, Tr. Vol. 25 at 3717:10-12.

³⁹ See *id.* at 3717:25-27.

⁴⁰ *Id.* at 3717:15-16 (*emphasis added*).

have earned \$19.20/kW-yr of ancillary services revenue for selling its output in SP-15 during 2003 and would have earned \$27.80/kW-yr of ancillary services revenues for selling its output in SP-15 during 2004.⁴¹

The evidence of record unequivocally demonstrates that SDG&E properly calculated \$14.82/kW-yr of ancillary services value associated with a combustion turbine and that this is a very reasonable value. Therefore, there is no basis for reducing SDG&E's value by two-thirds. To the extent the Commission retains a separate "as-available" capacity payment, the Proposed Decision should be modified to deduct the full \$14.82/kW-yr of ancillary services value from the combustion turbine fixed charge in calculating the "as-available" capacity payment payment. For 2007, this would yield an "as-available" capacity price of \$50.96/kW-yr: \$65.78/kW-yr less \$14.82/kW-yr of ancillary services value.

2. The "As-Available" Capacity Price Adopted in the Proposed Decision Should Only Be Paid To The Extent The Capacity Satisfies Resource Adequacy Obligations

The Proposed Decision states that "as-available" capacity payments "will no longer be contingent on [resource adequacy] counting rules."⁴² According to the Proposed Decision, "further consideration of any 'disparity' between the adopted [resource adequacy] counting rules and the reality of resource needs of the CAISO can be ended by acknowledging that as-available capacity payments under the prospective QF Program will not be contingent upon future determinations on the [resource adequacy] counting rules."⁴³ This aspect of the Proposed Decision will yield payments that exceed SCE's avoided cost to the extent "as-available" QF contracts will not satisfy SCE's resource adequacy obligations. As SCE explained in its testimony, the avoided cost of capacity associated with an "as-available" resource is *zero* unless

⁴¹ See Ex. 48 at 2-29–2-30 (California Independent System Operator 2004 Annual Report on Market Issues and Performance).

⁴² Proposed Decision at 87.

⁴³ *Id.*

that resource can satisfy a load-serving entity's resource adequacy obligations.⁴⁴ Therefore, the Proposed Decision should be modified to state that, to the extent "as-available" QF contracts will not satisfy SCE's resource adequacy obligations, the avoided cost of "as-available" capacity is zero.

3. The Firm Capacity Price Adopted in the Proposed Decision Exceeds SCE's Avoided Cost Because It Fails to Deduct Energy-Related Capital Costs and Residual Value

The Proposed Decision adopts a firm capacity price of \$104/kW-yr "based on the market price referent (MPR) capacity cost adopted in Resolution E-4049 of \$980/kW, annualized over a 20-year term at a Weighted-Average Cost of Capital (WACC) rate of 8.5%"⁴⁵ As discussed below, the \$104/kW-yr capacity price overpays for capacity because it fails to deduct energy-related capital costs and fails to adjust for the residual value of the MPR proxy as a result of having an operating life greater than 20 years. To properly reflect SCE's avoided cost of capacity, the \$104/kW-yr firm capacity price in the Proposed Decision should be reduced by at least \$21/kW-yr to account for energy-related capital costs and by \$10/kW-yr to account for residual value, yielding a firm capacity price no greater than \$73/kW-yr.⁴⁶

a) The Firm Capacity Price In The Proposed Decision Should Be Reduced By At Least \$21/kW-yr To Account For Energy-Related Capital Costs

As the Proposed Decision explains, the \$104/kW-yr firm capacity price is computed from the full capital cost of the combined-cycle gas turbine proxy used in the MPR, which has an average heat rate of 6,918 Btu/kWh.⁴⁷ The undisputed evidence in this proceeding demonstrates

⁴⁴ See SCE Opening Testimony, Ex. 1 at 94:9-14.

⁴⁵ Proposed Decision at 85-86.

⁴⁶ See SCE Rebuttal Testimony, Ex. 2 at 79.

⁴⁷ See *id.* at 92; Res. E-4049 at 10-11, Appx. E.

that, as a result of its relatively low heat rate, a combined-cycle gas turbine will run “in-the-money” and receive additional energy-related operating profits in many hours of the year.⁴⁸ Those additional energy-related operating profits, known as energy-related capital costs or inframarginal rents, offset a portion of the combined-cycle gas turbine’s fixed costs and must be deducted from the annualized capital cost to avoid over-payment for capacity.⁴⁹ As CCC witness Beach explained, “[t]he energy component of the LRAC price will cover some of the combined-cycle gas turbine’s capital costs – so-called ‘energy-related capital costs’ – which are higher than the capital costs of a simple-cycle [combustion turbine], in order for the [combined-cycle gas turbine] to achieve a much lower heat rate.”⁵⁰ Even CAC/EPUC witness Schoenbeck acknowledged that “some portion of the capital cost of a combined-cycle gas turbine essentially pays for the lower heat rate that a combined-cycle gas turbine has compared to a simple-cycle combustion turbine.”⁵¹

FERC has also recognized that a deduction for energy revenues, sometimes referred to as peak energy rents (PER), is appropriate when calculating capacity costs. As discussed above, FERC’s order approving the RPM used in the PJM capacity market adopted the use of an offset for net energy revenues.⁵² In addition, FERC’s orders approving the ISO New England’s Forward Capacity Market (FCM) adopted the use of a PER offset to monthly capacity payments.⁵³ As FERC explained,

[c]apacity suppliers will have their monthly capacity payments reduced to account for [the following] phenomena. [A] “peak energy rent” sum will be deducted from monthly capacity payments. The peak energy rent sum, originally developed in the

⁴⁸ See SCE Rebuttal Testimony, Ex. 2 at 73, 79.

⁴⁹ See *id.*

⁵⁰ CCC Opening Testimony, Ex. 102 at 79:3-6.

⁵¹ CAC/EPUC/Schoenbeck, Tr. Vol. 29 at 4267:26-4268:1.

⁵² See *PJM Interconnection, LLC*, 117 FERC at 62,657 (“Cost of New Entry [is] offset by the net energy and ancillary services revenues [T]he height of the [demand] curve is determined in large part by net Cost of New Entry, which is Cost of New Entry net of the Net Energy and Ancillary Service Revenue offset.”).

⁵³ See *Devon Power LLC, Order Accepting Proposed Settlement Agreement*, 115 FERC ¶ 61,340, 62,307 (Jun. 16, 2006); *Devon Power LLC, Order on Rehearing and Clarification*, 117 FERC ¶ 61,133 (Oct 31, 2006).

LICAP proposal, is based on revenues that would be earned in the energy market by a hypothetical, proxy peaking unit.⁵⁴

“The PER offset was designed to adjust the LICAP [capacity] payments with the energy market profits from a benchmark unit to assure that the [capacity] payments did not double-count energy rents.”⁵⁵

There is no direct evidence in this proceeding of the energy-related capital costs specific to the combined-cycle gas turbine proxy used in the MPR. However, evidence of record clearly establishes that the energy benefits associated with the MPR proxy unit exceed \$21/kW-yr. In its rebuttal testimony, SCE analyzed the energy benefits associated with SDG&E’s 2005 RAMCO peaking project.⁵⁶ SCE’s analysis demonstrated that the fixed cost of the RAMCO project should be reduced by \$21/kW-yr to account for energy-related capital costs associated with this energy-efficient combustion turbine.⁵⁷

The RAMCO project is a General Electric LM6000 simple-cycle combustion turbine with a heat rate of 8,434 Btu/kWh (LHV).⁵⁸ However, as discussed above, the average heat rate of the combined-cycle gas turbine proxy used in the MPR is 6,918 Btu/kWh (HHV).⁵⁹ The energy-related capital cost of the combined-cycle gas turbine proxy used in the MPR will be *substantially greater* than the \$21/kW-yr of energy-related capital costs associated with the RAMCO simple-cycle combustion turbine because the MPR proxy unit has a much lower heat rate than the RAMCO simple-cycle combustion turbine. Therefore, the \$104/kW-yr firm capacity price in the Proposed Decision should be reduced by *at least* \$21/kW-yr to account for energy-related capital cost.

⁵⁴ *Devon Power LLC, Order Accepting Proposed Settlement Agreement*, 115 FERC at 62,307.

⁵⁵ *Devon Power LLC, Order on Rehearing and Clarification*, 117 FERC at n.75.

⁵⁶ See SCE Rebuttal Testimony, Ex. 2 at 73.

⁵⁷ *Id.* at 73, 75.

⁵⁸ *Id.* at 73 n.82.

⁵⁹ See Res. E-4049 at Appx. E.

Such a reduction is entirely consistent with the testimony of QF Parties witness Cavicchi. As Mr. Cavicchi explained during cross-examination, the CAISO's DMA calculated that a new combustion turbine would have earned \$45/kW-yr for selling its output in SP-15 during 2004:

Q So what level of net revenues does the DMA calculate would be earned by a new combustion turbine for selling its output in SP15 during 2003?

A \$32 to \$36 per kilowatt -- I'm sorry -- \$36 per kilowatt year.

Q That it is \$36 per kilowatt year for SP15 figure for 2003, right?

A That's what I said.

Q Right. And what would the figure be for 2004?

A \$45 per kilowatt year.

Q Is it your understanding that the term net revenues as it is used in this report here provides a contribution to the generator's recovery of fixed costs?

A Yes, I believe that's the way this term is used in the report.⁶⁰

The same CAISO report referenced by Mr. Cavicchi calculated that a new combined-cycle gas turbine would have earned \$55/kW-yr for selling its output in SP-15 during 2004.⁶¹ Thus, the \$21/kW-yr reduction is a very conservative estimate of the energy-related capital cost associated with the combined-cycle gas turbine proxy used in the MPR. Therefore, the \$104/kW-yr firm capacity price in the Proposed Decision should be reduced by at least \$21/kW-yr to account for energy-related capital costs.

⁶⁰ QF/Cavicchi, Tr. Vol. 22 at 3228:17-3229:3; *see also* Ex. 48 at 2-29-2-30 (California Independent System Operator 2004 Annual Report on Market Issues and Performance).

⁶¹ *See* Ex. 48 at 2-27-2-30.

b) The Firm Capacity Price In The Proposed Decision Should Also Be Reduced By \$10/kW-yr To Account For The Residual Value Of The Combined-Cycle Gas Turbine Proxy

The \$104/kW-yr firm capacity price in the Proposed Decision is “based on the market price referent (MPR) capacity cost . . . *annualized over a 20-year term*”⁶² As SCE explained in its rebuttal testimony, annualizing the capital cost of a unit over a 20-year term, instead of a 30-year economic/operating life, overstates capacity value by approximately \$10/kW-yr.⁶³

The appropriate life-cycle of the combined-cycle gas turbine proxy should be 30 years, not 20 years. “[M]any of SCE’s former gas-fired peaking facilities have operated beyond the 30-year anniversary of their in-service dates.”⁶⁴ “For example, the following Southern California natural gas peaking facilities were retired after more than 30 years of operating service: Alamitos Unit 7 (34 years), Etiwanda Unit 5 (35 years), and Huntington Beach Unit 5 (34 years). Furthermore, the following peakers are currently in operation: Elwood (built in 1974) and Mandalay Unit 3 (built in 1970).”⁶⁵ In addition, “SCE’s own CTs at Mountainview [were] approved by the Commission based on an assumed 30-year economic/operating life.”⁶⁶

Even the combustion turbine capacity values that were proposed by TURN, and adopted by the Proposed Decision for “as-available” capacity pricing, are based on an economic life greater than 20 years. As TURN witness Marcus explained, “I used a 25-year book and economic life for the combustion turbine. SDG&E’s RAMCO CT has a 25 year depreciable life”⁶⁷

⁶² Proposed Decision at 85-86 (*emphasis added*).

⁶³ See SCE Rebuttal Testimony, Ex. 2 at 71-72.

⁶⁴ *Id.* at 71.

⁶⁵ *Id.* at 71 n.76.

⁶⁶ *Id.* at 71.

⁶⁷ TURN Opening Testimony, Ex. 149 at B-3.

Annualizing full capital cost recovery of a combined-cycle gas turbine over a 20-year term, instead of a 30-year economic/operating life, results in a higher capacity cost and fails to account for the “residual value” of the combined-cycle gas turbine after 20 years.⁶⁸ Table V-3 in SCE’s rebuttal testimony provides several examples that quantify this residual value.⁶⁹ Overall, the residual value associated with a 20-year term is approximately \$10/kW-yr.⁷⁰ Therefore, the \$104/kW-yr firm capacity price in the Proposed Decision should be reduced by \$10/kW-yr to account for the residual value of the combined-cycle gas turbine proxy, in addition to the above-described reduction for energy-related capital cost.

In total, the \$104/kW-yr firm capacity price in the Proposed Decision should be reduced by at least \$21/kW-yr to account for energy-related capital costs and by \$10/kW-yr to account for residual value, yielding a firm capacity price no greater than \$73/kW-yr.

III.

THE PROPOSED DECISION COMMITS LEGAL ERROR IN FAILING TO ORDER A RETROACTIVE TRUE-UP OF SRAC ENERGY PRICES

The Proposed Decision states that “this decision updates the methodology for calculating SRAC energy prices *on a prospective basis only*, to ensure that SRAC prices continue to reflect utility avoided cost in the changing electricity markets in California.”⁷¹ The sole basis offered for failing to order a retroactive true-up of SRAC energy prices is that “[s]ince the outset of the QF Program, SRAC energy prices have always been set on a prospective basis. With respect to retroactive adjustments of these prices, the Commission has generally declined to make retroactive downward adjustments.”⁷² This portion of the Proposed Decision commits legal error.

⁶⁸ See SCE Rebuttal Testimony, Ex. 2 at 71-72, 75.

⁶⁹ See *id.* at 75.

⁷⁰ *Id.* at 72, 75.

⁷¹ Proposed Decision at 9 (*emphasis added*).

⁷² *Id.* at 21.

The evidence of record clearly demonstrates that the SRAC transition formula current in place has yielded energy payments in excess of SCE's avoided cost for many years.⁷³ Under these circumstances, the Commission has both the authority⁷⁴ and the duty to order retroactive adjustment of SRAC prices to comport with the newly adopted MIF. The Second District Court of Appeal has expressly stated that the Commission has a *legal duty* to make appropriate retroactive adjustments to SRAC prices.⁷⁵ "[I]f the evidence shows that the formula in Decision No. 01-03-067 should have been applied retroactively to arrive at a more accurate SRAC, then it is the Commission's duty to apply it retroactively."⁷⁶ Indeed, in a more recent decision, the Court of Appeal also noted that the Commission declared "that if a decision in R.04-04-025 shows a systematic violation of PURPA, then Edison is to be given credit for any PURPA violations by reason of Edison being required to enter into SO1 contracts with QFs"⁷⁷ Therefore, to comply with the Court of Appeal's decisions, the Commission should modify the Proposed Decision to state that the Commission will retroactively adjust SRAC transition formula prices to comport with the newly adopted MIF.

IV.

THE PROPOSED DECISION SHOULD ALLOW SCE TO IMPLEMENT CREDIT PERFORMANCE REQUIREMENTS IN ALL NEW OR RENEWED QF CONTRACTS

The Proposed Decision provides that QFs with expiring contracts that seek to sign new one- to five-year "as-available" contracts or one- to ten-year firm capacity contracts "shall not be required to provide new credit support"⁷⁸ This portion of the Proposed Decision should be

⁷³ See SCE Opening Testimony, Ex. 1 at 56-61.

⁷⁴ See D.01-12-025 at 4.

⁷⁵ See *S. Cal. Edison Co. v. Cal. P.U.C.*, 128 Cal. App. 4th 1, 12 (2005); *S. Cal. Edison Co. v. Cal. P.U.C.*, 101 Cal. App. 4th 982, 999 (2002).

⁷⁶ *S. Cal. Edison Co.*, 128 Cal. App. 4th at 12 (*quoting S. Cal. Edison Co.*, 101 Cal. App. 4th at 999).

⁷⁷ *S. Cal. Edison Co.*, 128 Cal. App. 4th at 12.

⁷⁸ Proposed Decision at 117.

modified to allow the utilities to pursue standard credit performance requirements in all new or renewed QF contracts.

Although current QF contracts do not contain credit performance requirements, these contracts pre-date the development of today's credit risk framework. Accordingly, the lack of credit performance requirements in current QF contracts is not a valid justification for eliminating credit performance requirements in new or renewed QF contracts. Including standard credit performance requirements in all new or renewed QF contracts will provide financial protection to utility ratepayers in the event of contractual non-performance by a QF. Therefore, the Proposed Decision should be modified to allow the utilities to pursue standard credit performance requirements in all new or renewed QF contracts.

V.

CONCLUSION

For the foregoing reasons, SCE respectfully requests that the Commission adopt the Proposed Decision with the modifications described above and in Attachment A.

Respectfully submitted,

FRANK J. COOLEY
BERJ K. PARSEGHIAN

/s/ Berj K. Parseghian

By: Berj K. Parseghian

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May 25, 2007

ATTACHMENT A

Modify text on page 2 as follows:

- ~~• Two Standard Contract Options for Expiring or Expired QF Contracts and New QFs~~
~~— Our Prospective QF Program:~~
 - ~~• One to Five Year As Available Power Contract.~~
 - ~~• One to Ten Year Firm, Unit-Contingent Power Contract.~~
- QFs will **also** continue to have the option of either participating in Investor-Owned Utilities (IOU) power solicitations, or negotiating bilateral contracts with the IOUs.

Modify text on page 3 as follows:

- ~~• Payments for Firm Capacity: Based on the market price referent (MPR) capacity cost adopted in Resolution E-40492 of \$980/kW, annualized over a 20-year term at a Weighted Average Cost of Capital (WACC) rate of 8.5%, which results in an annual amortized cost of \$104/kW-year.~~
- ~~• The EEI contract will be the basis for our Prospective QF Program contract options; however, a simplified version of the EEI contract shall be utilized for Small QFs.~~

Modify text on pages 7 and 8 as follows:

~~However, we are persuaded that there are currently few options to utility purchases, particularly for Small QFs, whose size prevents them from participation in the CAISO markets. These QF should continue to have available standard offers, albeit at market prices.~~

For these reasons, we adopt ~~two flexible market-based contract options in addition to the competitive solicitation and bilateral contracting options already available to QFs~~ as our implementation of PURPA. ~~To safeguard against oversubscription in the future, we adopt a process by which the utilities can request relief from the requirement to enter into the standard offers.~~

~~First, QFs who choose only to provide non-firm, as-available power will have access to a one-to five-year as-available contract with energy prices based on the MIF formula and posted as-available capacity payments based on the cost of a combustion turbine less the estimated value of Ancillary Services.~~

~~Second, we will make available a one-to-ten-year contract for firm unit-contingent power, with energy prices based on the MIF formula, and capacity payments based on the market price referent (MPR) capacity cost adopted in Resolution E-4049 of \$980/kW, annualized over a 20-year term at a Weighted Average Cost of Capital (WACC) rate of 8.5%, which results in an annual amortized cost of \$104/kW-year. This longer-term contract option is intended to provide~~

~~sufficient contract and pricing certainty to allow QFs to make decisions on capital expenditures for facilities and upgrades.~~

Delete text on page 9 as follows:

~~Furthermore, this decision updates the methodology for calculating SRAC energy prices on a prospective basis only, to ensure that SRAC prices continue to reflect utility avoided cost in the changing electricity markets in California.~~

Modify text on page 66 as follows:

(See Exhibit 1, pp. 64-65.) We will allow SDG&E and the other utilities to ~~annually~~ update the intrastate transportation rate to the most recent value in their gas tariffs, as necessary.

Modify text on page 68 as follows:

As noted above, the Legislature did not adopt a specific formula, nor did it adopt specific TOU factors. Therefore, it is appropriate to update the TOU or TOD factors periodically. The evidence in this proceeding ~~clearly~~ demonstrates that the TOU/TOD data ~~is may, in some cases, be~~ outdated. ~~No party requested a change to SCE's TOU factors, and Unfortunately,~~ the parties recommending specific changes to the TOU/TOD factors and periods did not provide a sufficient showing to support their recommendations. Nevertheless, we believe that updating the IOUs TOU/TOD factors and periods to be consistent with the TOU factors adopted in other procurement proceedings is reasonable and will require the IOUs to ~~include the TOU/TOD factors and periods utilized as part of their most recent RFOs. We also require the IOUs to~~ provide updated TOU/TOD factors and periods when they file their next long-term procurement plans for approval.

Delete text on pages 85-86 as follows:

~~Today, we adopt two contract options for expiring or expired QF contracts and new QFs—Our Prospective QF Program. The first option is a one-to five-year as-available power contract. The second is a one-to ten-year firm, unit-contingent power contract. Payments for as-available capacity will be based on the fixed cost of a Combustion Turbine (CT) as proposed by The Utility Reform Network (TURN), less the estimated value of Ancillary Services (A/S) as generally proposed by San Diego Gas & Electric Company (SDG&E). Payments for firm, unit-contingent capacity will be based on the market price referent (MPR) capacity cost adopted in Resolution E-404985 of \$980/kW, annualized over a 20-year term at a Weighted Average Cost of Capital (WACC) rate of 8.5%, which results in an annual amortized cost of \$104/kW-year.~~

Delete text on pages 86-87 as follows:

~~The issue of whether any of this QF power counts for purposes of RA is now moot with respect to the capacity payments because the capacity payments will no longer be contingent on RA counting rules. This follows from the fact that we cannot reasonably institute a meaningful long-term policy for expiring QF contracts, nor a policy for the entry of new QFs unless there is a capacity payment commitment.~~

Modify text on page 87 as follows:

At this point, further consideration of any ‘disparity’ between the adopted RA counting rules and the reality of resource needs of the CAISO can be ended by acknowledging that as-available capacity payments under the prospective QF Program will ~~not~~ be contingent upon future determinations on the RA counting rules. ~~Instead, the RA counting rules can count or not count QF power, depending upon how the RA portfolios will be conceptualized in the future.~~

Modify text on page 90 as follows:

For the as-available contract option, we adopt the CT cost and real economic carrying charge rate calculations proposed by TURN as presented in Exhibit 149, Appendix B, with an ancillary services adjustment of \$14.82/kW-year subtracted from the adopted value as suggested by SDG&E. ~~The estimated ancillary services value proposed by SDG&E is an annual average value; however, we believe this is an over-estimate and should be adjusted downward to reflect the fact that SDG&E’s value of \$14.82/kW-year is more indicative of a peak value. Accordingly, we reduce it by two-thirds to \$4.94/kW-year.~~ TURN calculates a total marginal CT cost of \$64.13/kW-year in 2006. Using the adopted TURN value for \$64.13, the resulting capacity value would be \$49.31/kW-year ~~\$59.19/kW-year~~ (\$64.13/kW-year - \$14.82/kW-year ~~\$4.94/kW-year~~).

Delete section 6 of text on pages 90 – 93

Delete text on page 116 as follows:

~~First, for existing QFs, the utilities shall offer new one- to five-year, as-available standard offer contracts to QFs. The contracts shall be updated to require compliance with CAISO tariffs, including the Resource Adequacy (RA) tariff. However, QFs with expiring contracts seeking to sign new, one- to five-~~

Delete text on page 117

Modify text on page 118 as follows:

~~should they be required to perform additional interconnection studies. QFs larger than one megawatt are responsible for scheduling coordination, although the utilities must offer scheduling service to QFs at a reasonable cost. QFs who are not able to offer unit firm capacity will be able to either continue on a one- to five-year as-available contract from year to year or may participate in utility resource solicitations and bilateral negotiations.~~

~~The third option, available to QFs desiring longer-term contracts or more flexible contract options, is to may participate in utility resource solicitations or bilateral negotiations.~~

Modify text on page 120 as follows:

In conclusion, we find that ~~a combination of market-based offers along with~~ the ability to compete for ~~longer-term~~ contracts best reflects the utilities’ avoided cost and meets California’s goals for acquiring and retaining cost-effective, environmentally sound generation.

Delete text on page 121 as follows:

~~Furthermore, requiring the utilities to make available one to ten-year unit firm capacity contracts, as well as optional one-to five-year as-available contracts is consistent with and supports one of the key actions in the EAP II.~~

Delete section 7.4.1 of text on pages 122-124

Modify Finding of Fact No. 32 as follows:

~~32. It is reasonable to reduce the estimated ancillary services value proposed by SDG&E by two-thirds to reflect the fact that SDG&E's value is an annual average value and ancillary services needs occur primarily in peak periods. Accordingly, we reduce SDG&E's suggested ancillary services value by two-thirds to \$4.94/kW-year. We adopt SDG&E's suggested ancillary services value of \$14.82/kW-year.~~

Delete Finding of Fact No. 33

Add Conclusion of Law after Conclusion of Law No. 6 as follows:

To the extent "as-available" QF contracts will not satisfy resource adequacy obligations, the avoided cost of "as-available" capacity is zero and the "as-available" capacity price shall be set to zero.

Add Conclusion of Law No. 17 as follows:

We will retroactively adjust SRAC transition formula prices to comport with the newly adopted MIF.

Add Conclusion of Law No. 18 as follows:

All new or renewed QF contracts must comply with the greenhouse gas emissions performance standard to the extent required by Senate Bill 1368 and Decision No. 07-01-039.

Delete Ordering Paragraph No. 2

Delete Prospective QF Program columns from Table 1

Modify Table 1, Footnote * as follows:

* The heat rate component of the Market Index Formula is that proposed by SCE, ~~except for the O&M deduction~~, Exhibit 1, p.61.

Modify Table 4, Table Notes as follows:

Heat rates in the table above will be calculated monthly, as described in Exhibit 1, ~~with the exception that the MIF does not deduct an O&M value from the power price in the heat rate calculation.~~ Note that current heat rates may be slightly different at NP15 and SP15, respectively, due to fluctuating market conditions.

~~To illustrate the MIF, heat rate data from the record is shown. The heat rate of 7903 Btu/kWh is from Exhibit 1, Figure 10, Sample Derivation of IER, page 63 for the August 2004 through July 2005 time period; however, the variable O&M adder is set to zero in Column B in Figure 10 in the heat rate calculation (not subtracting it from the power price). Thus, the adopted heat rate is an unadjusted market heat rate.~~

Modify Table 4a to indicate an adopted as-available capacity price of \$50.96/kW-yr for 2007

Modify Table 4a to delete Adopted Unit-Contingent, Firm Power row

Delete Table 4a, Table Notes

ATTACHMENT B

Modify text on page 2 as follows:

- ~~• Two Standard Contract Options for Expiring or Expired QF Contracts and New QFs
— Our Prospective QF Program:~~
 - ~~• One to Five Year As Available Power Contract.~~
 - ~~• One to Ten Year Firm, Unit-Contingent Power Contract.~~
- QFs will **also** continue to have the option of either participating in Investor-Owned Utilities (IOU) power solicitations, or negotiating bilateral contracts with the IOUs.

Modify text on page 3 as follows:

- Payments for Firm Capacity: Based on the market price referent (MPR) capacity cost adopted in Resolution E-40492 of \$980/kW, annualized over a 20-year term at a Weighted-Average Cost of Capital (WACC) rate of 8.5%, less energy-related capital costs and residual value, which results in an annual amortized cost of \$73/kW-year \$104/kW-year.
- ~~• The EEI contract will be the basis for our Prospective QF Program contract options; however, a simplified version of the EEI contract shall be utilized for Small QFs.~~

Modify text on page 8 as follows:

Second, we will make available a one-to-ten-year contract for firm unit-contingent power, with energy prices based on the MIF formula, and capacity payments based on the market price referent (MPR) capacity cost adopted in Resolution E-4049 of \$980/kW, annualized over a 20-year term at a Weighted Average Cost of Capital (WACC) rate of 8.5%, less energy-related capital costs and residual value, which results in an annual amortized cost of \$73/kW-year \$104/kW-year.

Delete text on page 9 as follows:

~~Furthermore, this decision updates the methodology for calculating SRAC energy prices on a prospective basis only, to ensure that SRAC prices continue to reflect utility avoided cost in the changing electricity markets in California.~~

Modify text on page 66 as follows:

(See Exhibit 1, pp. 64-65.) We will allow SDG&E and the other utilities to **annually** update the intrastate transportation rate to the most recent value in their gas tariffs, as necessary.

Modify text on page 68 as follows:

As noted above, the Legislature did not adopt a specific formula, nor did it adopt specific TOU factors. Therefore, it is appropriate to update the TOU or TOD factors periodically. The evidence in this proceeding ~~clearly~~ demonstrates that the TOU/TOD data is may, in some cases, be outdated. No party requested a change to SCE's TOU factors, and ~~Unfortunately,~~ the parties recommending specific changes to the TOU/TOD factors and periods did not provide a sufficient showing to support their recommendations. Nevertheless, we believe that updating the IOUs TOU/TOD factors and periods to be consistent with the TOU factors adopted in other procurement proceedings is reasonable and will require the IOUs to ~~include the TOU/TOD factors and periods utilized as part of their most recent RFOs. We also require the IOUs to~~ provide updated TOU/TOD factors and periods when they file their next long-term procurement plans for approval.

Modify text on page 86 as follows:

a 20-year term at a Weighted Average Cost of Capital (WACC) rate of 8.5%, less energy-related capital costs and residual value, which results in an annual amortized cost of \$73/kW-year ~~\$104/kW-year.~~

Delete text on pages 86-87 as follows:

~~The issue of whether any of this QF power counts for purposes of RA is now moot with respect to the capacity payments because the capacity payments will no longer be contingent on RA counting rules. This follows from the fact that we cannot reasonably institute a meaningful long-term policy for expiring QF contracts, nor a policy for the entry of new QFs unless there is a capacity payment commitment.~~

Modify text on page 87 as follows:

At this point, further consideration of any 'disparity' between the adopted RA counting rules and the reality of resource needs of the CAISO can be ended by acknowledging that as-available capacity payments under the prospective QF Program will ~~not~~ be contingent upon future determinations on the RA counting rules. ~~Instead, the RA counting rules can count or not count QF power, depending upon how the RA portfolios will be conceptualized in the future.~~

Modify text on page 90 as follows:

For the as-available contract option, we adopt the CT cost and real economic carrying charge rate calculations proposed by TURN as presented in Exhibit 149, Appendix B, with an ancillary services adjustment of \$14.82/kW-year subtracted from the adopted value as suggested by SDG&E. ~~The estimated ancillary services value proposed by SDG&E is an annual average value; however, we believe this is an over-estimate and should be adjusted downward to reflect the fact that SDG&E's value of \$14.82/kW-year is more indicative of a peak value. Accordingly, we reduce it by two-thirds to \$4.94/kW-year.~~ TURN calculates a total marginal CT cost of \$64.13/kW-year in 2006. Using the adopted TURN value for \$64.13, the resulting capacity value would be \$49.31/kW-year ~~\$59.19/kW-year~~ ($\$64.13/\text{kW-year} - \$14.82/\text{kW-year}$ ~~\$4.94/kW-year~~).

Modify Table 7 on page 92 to indicate an adopted capacity price of \$73/kW-year

Add text on page 93 after Figure 2 as follows:

From this \$104/kW-yr capacity price, we must deduct energy-related capital costs and adjust for the residual value of the MPR proxy as a result of having an operating life greater than 20 years. As a result of its relatively low heat rate, a combined-cycle gas turbine will run “in-the-money” and receive additional energy-related operating profits in many hours of the year. Those additional energy-related operating profits, known as energy-related capital costs, offset a portion of the combined-cycle gas turbine’s fixed costs and must be deducted from the capacity price to avoid over-payment for capacity. The energy-related capital cost of the combined-cycle gas turbine proxy used in the MPR will be at least \$21/kW-yr, the energy-related capital costs associated with the RAMCO simple-cycle combustion turbine, because the MPR proxy unit has a much lower heat rate than the RAMCO simple-cycle combustion turbine.

In addition, the \$104/kW-yr capacity price is based on the MPR capacity cost annualized over a 20-year term. However, as SCE explained in its rebuttal testimony, annualizing the capital cost of a unit over a 20-year term, instead of a 30-year economic/operating life, overstates capacity value by approximately \$10/kW-yr, which must be deducted. Therefore, to properly reflect the avoided cost of capacity, the \$104/kW-yr firm capacity price should be reduced by \$21/kW-yr to account for energy-related capital costs and by \$10/kW-yr to account for residual value, yielding a firm capacity price of \$73/kW-yr.

Modify text on page 117 as follows:

year as-available contract shall ~~not~~ be required to provide ~~standard~~^{new} credit support provisions but shall not be required to provide~~new~~ interconnection studies.

Modify text on pages 117-118 as follows:

The new contracts will also have updated performance requirements to reflect the firm capacity, but QFs with expiring contracts seeking to sign new unit-firm contracts shall ~~not~~ have to provide ~~standard~~^{new} credit support, ~~but~~^{new} should ~~not~~^{they} be required to perform additional interconnection studies.

Modify Finding of Fact No. 32 as follows:

32. It is reasonable to reduce the estimated ancillary services value proposed by SDG&E by two-thirds to reflect the fact that SDG&E’s value is an annual average value and ancillary services needs occur primarily in peak periods. Accordingly, we reduce SDG&E’s suggested ancillary services value by two-thirds to \$4.94/kW-year. We adopt SDG&E’s suggested ancillary services value of \$14.82/kW-year.

Add Finding of Fact No. 37 as follows:

The benefits and costs of new QF obligations should be allocated to all customers to avoid imposing potential stranded costs solely on utilities.

Add Conclusion of Law after Conclusion of Law No. 6 as follows:

To the extent “as-available” QF contracts will not satisfy resource adequacy obligations, the avoided cost of “as-available” capacity is zero and the “as-available” capacity price shall be set to zero.

Add Conclusion of Law No. 17 as follows:

We will retroactively adjust SRAC transition formula prices to comport with the newly adopted MIF.

Add Conclusion of Law No. 18 as follows:

The contracts adopted by this decision will only be available to existing QFs with contracts that expire in a rolling 24-month window and to new QFs that will come online within a rolling 36-month window. These contracts will cease to be available from a utility as of the effective date of a FERC order terminating that utility’s PURPA purchase obligation.

Add Conclusion of Law No. 19 as follows:

The benefits and costs of new QF obligations should be allocated to all customers. Public Utilities Code section 380(g) authorizes the Commission to allocate the costs of QF contract obligations entered into for system reliability reasons to all customers. In addition, Public Utilities Code section 380(b) authorizes the Commission to equitably allocate the cost of generating capacity and prevent shifting of costs between customer classes.

Add Conclusion of Law No. 20 as follows:

All new or renewed QF contracts must comply with the greenhouse gas emissions performance standard to the extent required by Senate Bill 1368 and Decision No. 07-01-039.

Modify Table 1, No. 2a as follows:

Based on the MPR capacity cost in E-4049 of \$980/kW which results in an annual cost of \$73/kW-year ~~\$104/kW-year~~.

Modify Table 1, No. 8 as follows:

Standard Credit Requirements~~None~~

Modify Table 1, Footnote * as follows:

* The heat rate component of the Market Index Formula is that proposed by SCE, ~~except for the O&M deduction~~, Exhibit 1, p.61.

Modify Table 4, Table Notes as follows:

Heat rates in the table above will be calculated monthly, as described in Exhibit 1, ~~with the exception that the MIF does not deduct an O&M value from the power price in the heat rate calculation~~. Note that current heat rates may be slightly different at NP15 and SP15, respectively, due to fluctuating market conditions.

~~To illustrate the MIF, heat rate data from the record is shown. The heat rate of 7903 Btu/kWh is from Exhibit 1, Figure 10, Sample Derivation of IER, page 63 for the August 2004 through July 2005 time period; however, the variable O&M adder is set to zero in Column B in Figure 10 in the heat rate calculation (not subtracting it from the power price). Thus, the adopted heat rate is an unadjusted market heat rate.~~

Modify Table 4a to indicate an adopted as-available capacity price of \$50.96/kW-yr for 2007

Modify Table 4a to indicate an adopted unit-contingent, firm capacity price of \$73/kW-year

Modify Table 4a, Table Notes as follows:

where Capacity Payment = ~~\$73/kW-year \$104/kW-year~~ ÷ 8.760 = ~~\$8.3 \$11.8~~ per MWh

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) COMMENTS ON PROPOSED DECISION OF ALJ HALLIGAN on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **25th day of May, 2007**, at Rosemead, California.

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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA

FILED

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Order Instituting Rulemaking to Promote Policy)	
and Program Coordination and Integration in)	
Electric Utility Resource Planning.)	Rulemaking 04-04-003
)	(Filed April 1, 2004)
Order Instituting Rulemaking to Promote)	
Consistency in Methodology and Input)	
Assumptions in Commission Applications of)	Rulemaking 04-04-025
Short-run and Long-run Avoided Costs, Including)	(Filed April 22, 2004)
Pricing for Qualifying Facilities.)	

SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)
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Dated: **June 4, 2007**

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE
STATE OF CALIFORNIA**

Order Instituting Rulemaking to Promote Policy)	
and Program Coordination and Integration in)	Rulemaking 04-04-003
Electric Utility Resource Planning.)	(Filed April 1, 2004)
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Pricing for Qualifying Facilities.)	

SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E)
REPLYCOMMENTS ON PROPOSED DECISION OF ALJ HALLIGAN

Pursuant to Rule 14.3 of the Commission’s Rules of Practice and Procedure, Southern California Edison Company (SCE) respectfully submits these reply comments on the Proposed Decision of Administrative Law Judge Halligan on Future Policy and Pricing for Qualifying Facilities (QFs), issued on April 24, 2007 (Proposed Decision).

I.

INTRODUCTION

As the opening comments of the three investor-owned utilities, The Utility Reform Network (TURN) and the Division of Ratepayer Advocates (DRA) all acknowledge, the Proposed Decision makes significant progress in modernizing QF pricing. The Proposed Decision appropriately adopts a market-based methodology, the Market Index Formula (MIF), as the best measure of the short-run avoided cost (SRAC) of energy, properly rejects the antiquated

QFs-out methodologies advocated by the QF parties as “neither reasonable nor practical[,]”¹ and properly rejects the QF parties’ unlawful proposals for mandatory fixed-price contracts.² The opening comments of the three investor-owned utilities, TURN and DRA consistently identify the same three errors in the Proposed Decision’s QF energy and capacity pricing methodologies, which result in prices that are above avoided cost:

- Failure to deduct variable operations and maintenance (O&M) from the power price in the MIF, resulting in a double-payment for variable O&M;
- Failure to properly deduct ancillary services value from the “as-available” capacity price; and
- Failure to deduct energy-related capital costs (sometimes referred to as inframarginal rents) and residual value from the firm capacity price.

As set forth in the foregoing comments, the errors in the QF energy and capacity pricing methodologies are easily correctable, and the corrections can be made based on the evidence of record in this proceeding.

It is critical that these corrections be made in order to avoid repeating mistakes of the past. As recognized by the Proposed Decision and discussed in SCE’s opening comments, standard offer contracts are not required to implement PURPA’s mandatory purchase obligation. To the extent, however, that the Commission concludes that standard offer contracts should be made available to QFs going forward, notwithstanding the risk and inherent inequity in imposing new standard offer contract obligations only on the investor-owned utilities and no other load-serving entities, the Commission should allocate the benefits and costs of such obligations to all customers and ensure that it gets the price right.

The errors noted above, while ostensibly technical, will have real dollar impacts for SCE’s customers for years to come. Indeed, *considering only those QFs with contracts expiring in 2007*, giving ten-year firm standard offer contracts to such QFs without appropriate adjustments to the firm capacity price, as explained in the opening comments of the utilities,

¹ See Proposed Decision at 50-51. Moreover, the Proposed Decision correctly identifies CCC’s “elasticity adder” as a form of QFs-out methodology that is designed “to adjust the forward prices to reflect the price increase if the ‘aggregate’ amount of QF energy production on the utility’s system is withheld.” Proposed Decision at 60.

² See *id.* at 127-28.

TURN and DRA, will produce over \$100 million (NPV 2007) in overpayments over the ten-year term of the contracts. And this assumes that no new QFs subscribe to this offer.

Failure to make the appropriate adjustments to the SRAC energy formula and “as-available” capacity price will also produce significant overpayments, as well as potential unintended consequences. For example, it is not inconceivable that QFs capable of providing firm capacity will find the “as-available” capacity price without attendant performance requirements sufficiently attractive such that they will elect not to provide firm capacity at all. The potential for significant overpayments is an inherent risk when standard offer contracts are combined with administratively-determined capacity pricing, as amply demonstrated by the current above-market capacity payments enjoyed by most QFs. This risk can be alleviated by abandoning standard offers as a vehicle for implementing PURPA and recognizing that there are meaningful opportunities for QFs to sell into today’s energy markets. SCE continues to advocate that the Commission reject the standard offer approach and find a market based approach for implementing PURPA that is more consistent with the overall direction of the Proposed Decision and state policy generally.

Not surprisingly, the QF parties’ opening comments have a consistent theme: the Proposed Decision produces prices that are too low. These arguments are without merit. The opening comments of the QF parties “merely reargue positions taken in briefs”³ or introduce new analysis that is both factually flawed and has no basis in the record, each according to its individual self-interest. For example, the opening comments of the Cogeneration Association of California and the Energy Producers and Users Coalition (CAC/EPUC) introduce material that is outside of the record in an effort to increase the firm capacity price and impose mandatory fixed-price contracts but do not take issue with the Proposed Decision’s adoption of the MIF or rejection of QFs-out. In contrast, the opening comments of the California Cogeneration Council (CCC) seek to undermine the MIF and impose a QFs-out elasticity adder but do not take issue with the Proposed Decision’s rejection of mandatory fixed-price contracts. Although it is not possible for SCE to respond to all of the issues raised in the QF parties opening comments in this reply, the Commission should recognize the QF parties’ contradictory comments as self-serving

³ See Rule 14.3(c) of the Commission’s Rules of Practice and Procedure.

and transparent attempts to gain above-market payments and set-asides at ratepayer expense and in violation of PURPA's avoided cost limitation.

II.

THE OF PARTIES' CRITICISMS OF THE HEAT RATE COLLARS ARE BASELESS AND SHOULD BE REJECTED

Both CAC/EPUC and CCC criticize the 5,864 Btu/kWh and 9,864 Btu/kWh heat rate "collars" adopted by the Proposed Decision. CCC goes so far as to introduce new analysis in support of its claim that the heat rate collars "deflate" NP-15 and SP-15 prices by 4%. CAC/EPUC and CCC's hostile attacks on the collars and SCE's methodology for deriving the collars are completely unwarranted. The heat rate collars were developed for the purpose of muting spot market volatility and triggering "expedited review of the methodology in the event of persistent and significant changes."⁴ Furthermore, the collars were developed based on a statistical analysis of historical data, the details of which are fully explained in SCE's opening testimony.⁵

CAC/EPUC and CCC's analyses criticizing the collars have no basis in the record and are factually flawed. CCC's claim that the heat rate collars "deflate" NP-15 and SP-15 prices by 4% ignores the fact that the Proposed Decision's MIF fails to deduct variable O&M from the power price. In addition to resulting in a double-payment for variable O&M, as discussed in SCE's opening comments, this error inflates the resulting heat rates by approximately 300-400 Btu/kWh and results in additional ceiling hits. Deducting variable O&M from the power price in the market heat rate calculation reduces the differential to 2.9%.

In addition, CCC examined only the time-period from April 2006 to March 2007 to reach its conclusions on the heat rate collars. Over the longer period of August 2002 to March 2007, the difference between the uncollared and collared heat rates (assuming variable O&M is properly deducted from the power price) would have been only 0.7%, with four ceiling hits and four floor hits.

⁴ SCE Opening Testimony, Ex. 1 at 67.

⁵ See *id.* at 67-70.

CAC/EPUC's argument that the heat rate ceiling should be based on a combustion turbine heat rate and the heat rate floor should be based on combined cycle gas turbine heat rate is also devoid of merit. CAC/EPUC's floor proposal mischaracterizes the full range of resources that may be on the margin. Although combined cycle gas turbines will be on the margin for many hours of the year, during certain lower load hours, baseload resources will be on the margin. Using a combined cycle gas turbine as the floor would improperly result in paying QFs based on a combined cycle gas turbine price at a time when coal, nuclear or must-run hydro is on the margin. Therefore, the Commission should reject both CCC and CAC/EPUC's criticisms of the heat rate collars as factually flawed and lacking any basis in the record.

III.

THE QF PARTIES ATTEMPTS TO INFLATE THE "AS-AVAILABLE" CAPACITY PRICE SHOULD BE REJECTED

Both CAC/EPUC and CCC attempt to inflate the "as-available" capacity price based on flawed analysis that lacks any basis in the record. With respect to "as-available" capacity, CCC makes an untenable argument in favor of levelized nominal valuation that is properly rejected by the Proposed Decision.⁶ CAC/EPUC argues that the "as-available" capacity value adopted in the Proposed Decision should not be reduced by ancillary service revenues associated with a combustion turbine's ability to provide non-spinning reserves when it is not running because QF pricing is premised on a QF running all the time.⁷ CAC/EPUC has it exactly backwards--it is precisely because a combustion turbine does not run all the time that it can receive non-spin revenues, something that QFs normally do not provide.⁸ Without the reduction for ancillary service revenues, the as-available capacity price would compensate QFs for something they do not provide and exceed avoided cost. Therefore, in calculating the "as-available" capacity price, the combustion turbine fixed charge should be reduced by the full ancillary services value calculated by SDG&E.

⁶ See Proposed Decision at 89-90.

⁷ See CAC/EPUC Opening Comments at 23.

⁸ At times that the QF is running while a combustion turbine would not run, the QF is able to earn operating profits by selling energy at a price which exceeds the QFs running cost.

IV.

THE QF PARTIES ATTEMPTS TO INFLATE THE FIRM CAPACITY PRICE SHOULD BE REJECTED

CAC/EPUC and CCC also attempt to inflate the firm capacity price based on defective analysis that refers to material outside of the record in this proceeding. Both CAC/EPUC and CCC purport to calculate the fixed component of the MPR for the first time in opening comments. Neither of these calculations is part of the record, and neither of these calculations apply the real economic carrying charge methodology that is adopted by the Proposed Decision to calculate the fixed charge for a combustion turbine.

Moreover, CAC/EPUC and CCC arrive at different results. CCC claims the fixed component of the MPR is \$118/kW-yr,⁹ while CAC/EPUC claims the fixed component of the MPR is \$157/kW-yr.¹⁰ Furthermore, both CAC/EPUC and CCC fail to deduct energy-related capital costs or residual value from these figures. As discussed in SCE's opening comments, as a result of its relatively low heat rate, a combined-cycle gas turbine will run "in-the-money" and receive additional energy-related operating profits in many hours of the year.¹¹ Those additional energy-related operating profits, known as energy-related capital costs or inframarginal rents, offset a portion of the combined-cycle gas turbine's fixed costs and must be deducted from the annualized capital cost to avoid over-payment for capacity.¹² As QF Parties witness Cavicchi explained during cross-examination, "there's some contribution of fixed costs that can be obtained by an appropriately efficient resource through the energy markets."¹³

Mr. Cavicchi discussed a California Independent System Operator (CAISO) Department of Market Analysis (DMA) report that quantified the energy-related capital costs associated with a combined-cycle gas turbine.¹⁴ The DMA report found that a new combined-cycle gas turbine would have earned \$55/kW-yr of energy-related revenues for selling its output in SP-15 during

⁹ See CCC Opening Comments at 24.

¹⁰ See CAC/EPUC Opening Comments at 22.

¹¹ See SCE Opening Comments at 14; SCE Rebuttal Testimony, Ex. 2 at 73, 79.

¹² See SCE Opening Comments at 14; SCE Rebuttal Testimony, Ex. 2 at 73, 79.

¹³ QF/Cavicchi, Tr. Vol. 22 at 3231:5-7.

¹⁴ See *id.* at 3228:17-3229:3, 3231:8-17; see also Ex. 48 at 2-27-2-30 (California Independent System Operator 2004 Annual Report on Market Issues and Performance); SCE Opening Comments at 14-16.

2004.¹⁵ The DMA's 2007 report, which contains more recent values, is not in the record in this proceeding. In any event, CAC/EPUC and CCC's firm capacity prices fail to take energy-related capital costs into account.

CAC/EPUC and CCC also fail to make any deduction for residual value. The firm capacity prices proposed by CAC/EPUC and CCC appear to be based on a 20-year term for capital recovery. However, as SCE explained in its opening comments, annualizing the capital cost of a unit over a 20-year term, instead of a 30-year economic/operating life, overstates capacity value by approximately \$10/kW-yr.¹⁶ Thus, in addition to having no basis in the record, CAC/EPUC and CCC's inflated and inconsistent firm capacity prices suffer from a number of methodological flaws. They should be rejected.

V.

CALWEA'S SUGGESTED MODIFICATIONS TO THE PROPOSED DECISION SHOULD BE REJECTED

The California Wind Energy Association (CalWEA) states that "a new interconnection study and arrangement should not be required for a QF with an existing interconnection arrangement so long as the interconnected QF's output will not change substantially after termination of the QF contract."¹⁷ CalWEA also states that FERC will exercise jurisdiction over a generator's interconnection to a utility's distribution facility when the facility is included in the public utility's open access tariff and the generator will be making FERC-jurisdictional wholesale sales of electric energy.¹⁸ CalWEA's assertions are an incomplete statement of the FERC-approved interconnection procedures that are in place, and CalWEA's suggested modifications to the Proposed Decision should be rejected.

Under FERC-approved interconnection procedures and the CAISO Tariff, QFs with existing interconnections who will make sales on the wholesale market (and no longer sell all of their generation to an investor-owned utility) must execute a new interconnection agreement regardless of whether or not the output and electrical characteristics of the facility remain the

¹⁵ See Ex. 48 at 2-27-2-30.

¹⁶ See SCE Opening Comments at 17-18.

¹⁷ CalWEA Opening Comments at 3.

¹⁸ See *id.*

same.¹⁹ Such QFs must also submit an affidavit to the CAISO and the interconnecting utility (Participating Transmission Owner or PTO) containing a representation “that the total capability and electrical characteristics of the qualifying facility will remain substantially unchanged” or, if there is any change to the total capability and electrical characteristics, describing any such changes.²⁰ If the CAISO and PTO agree that the QF will remain substantially unchanged, then the QF will not be required to submit an interconnection request and will not be placed in the interconnection queue (but still will be required to execute a new interconnection agreement).²¹ If, however, the output or characteristics of the QF have changed, then the QF must submit an interconnection request.²²

CalWEA’s proposed finding of fact and conclusion of law are not consistent with the foregoing rules. CalWEA’s request that existing QFs be allowed to retain their existing interconnection arrangements contradicts § 25 of the CAISO Tariff, and CalWEA’s proposed conclusion of law attempts to impose a standard for new interconnection studies that is inconsistent with the standard set forth in FERC’s rules and the CAISO Tariff. Therefore, CalWEA’s suggested modifications to the Proposed Decision should be rejected.

VI.

CAC/EPUC’S PROPOSED MODIFICATIONS TO THE PROCEDURE FOR IMPLEMENTING STANDARD OFFER CONTRACTS ARE UNREASONABLE AND SHOULD BE REJECTED

CAC/EPUC’s opening comments propose various changes to the Proposed Decision’s procedure for implementing standard offer contracts. Among other things, CAC/EPUC proposes that “[a]ll parties may file proposed standard offer contract forms no later than June 7, 2007, with reply comments on the proposals no later than June 21, 2007.”²³ CAC/EPUC further proposes that any disputes be resolved within 21 days by Assigned Commissioner’s ruling.

¹⁹ See CAISO Tariff § 25.

²⁰ *Id.* at § 25.1.2.

²¹ *Id.* at § 25.1.2.1.

²² *Id.* at § 25.1.2.2.

²³ CAC/EPUC Opening Comments at 4.

CAC/EPUC proposal is patently unreasonable and should be rejected. CAC/EPUC's proposal provides inadequate time to prepare complex contracts that will differ materially from prior forms of standard offer contract, which are now almost 30 years old. The Proposed Decision is on the agenda for the Commission's June 7, 2007 meeting. Assuming the decision is approved on June 7, 2007, the final text of the decision will not be available until June 8 at the earliest. It is grossly unreasonable to demand that proposed standard offer contracts be filed before a Commission decision is even issued.

Assuming the Commission's decision herein adopts standard offer contracts, the Proposed Decision's procedure for implementing such contracts, including the 45-day period for the utilities to file proposed contracts and the 21-day comment period, should be maintained to provide parties with a full and fair opportunity to be heard with respect to the terms and conditions of any standard offer contracts that are adopted. Furthermore, it is inappropriate to assume at this time that any disputes as to contract terms can be resolved by Assigned Commissioner's ruling.

VII.

CONCLUSION

For the foregoing reasons, SCE respectfully requests that the Commission adopt the Proposed Decision with the modifications described in SCE's opening comments.

Respectfully submitted,

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June 4, 2007

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) REPLY COMMENTS ON PROPOSED DECISION OF ALJ HALLIGAN on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **4th day of June, 2007**, at Rosemead, California.

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E) NOTICE OF EX PARTE COMMUNICATION on all parties identified on the attached service list(s). Service was effected by one or more means indicated below:

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

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